IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

THOMPSON PRODUCTS, INC.,)	
Plaintiff,)	
v.	į	C.A. No. 05-11810-RGS
GLENN THOMPSON, et al.,)	
Defendants.)	

MOTION FOR ADMISSION PRO HAC VICE OF SANDY T. TUCKER AND MONICA McCARROLL AS COUNSEL FOR THE PLAINTIFF, THOMPSON PRODUCTS, INC.

Plaintiff, Thompson Products, Inc. ("TPI") by its counsel, Andrew D. Kang, a member of the Bar of the Commonwealth of Massachusetts and a member of the firm Greenberg Traurig, LLP, respectfully moves for the admission to the Bar of this Court, *pro hac vice*, of Sandy T. Tucker and Monica McCarroll of the Virginia law firm Williams Mullen, PC to appear as cocounsel for TPI in this matter.

In support of this Motion, attached as Exhibits A and B are Affidavits from Mr. Tucker and Ms. McCarroll certifying that (1) they are members of the Bar in good standing in every jurisdiction where they have been admitted to practice; (2) there are no disciplinary proceedings pending against them as a member of the Bar of any jurisdiction; and (3) they are familiar with the Federal Rules of Civil Procedure and Local Rules of the District of Massachusetts.

WHEREFORE, Plaintiff, Thompson Products, Inc., respectfully requests that the Court grant its Motion for Admission Pro Hac Vice of Sandy T. Tucker and Monica McCarroll as co-counsel in this matter.

Respectfully submitted,

THOMPSON PRODUCTS, INC.

By its attorneys,

/s/ Andrew D. Kang

Terence P. McCourt (BBO #555784)
Andrew D. Kang (BBO #637476)

GREENBERG TRAURIG, LLP

One International Place Boston, MA 02110

Tel: 617.310.6000 Fax: 617.310.6001

1240034vl

CERTIFICATE OF SERVICE

I, Andrew D. Kang, hereby certify that on the 13th day of January, 2006, I served a copy of the foregoing by U.S. Mail to the following counsel of record:

Matthew F. Medeiros, Esq. LITTLE MEDEIROS KINDER BULMAN & WHITNEY, P.C. 72 Pine Street Providence, RI 02903

Michael S. Chinitz, Esq. Lisa A. Tenerowicz, Esq. ROSE & ASSOCIATES 29 Commonwealth Avenue Boston, MA 02110

/s/ Andrew D. Kang	
Andrew D. Kang	

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Plaintiff,)	
v.	Ć	C.A. No. 05-11810-RGS
GLENN THOMPSON, et al.,)	
Defendants.)	
)	

<u>AFFIDAVIT OF SANDY T. TUCKER IN SUPPORT OF</u> ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE*

- I, Sandy T. Tucker, on oath, hereby state as follows:
- 1. I am an attorney practicing in the Commonwealth of Virginia. I make this affidavit of my own personal knowledge in support of a motion that my colleague, Monica McCarroll, and I be permitted to appear before this Court *pro hac vice* as co-counsel for the plaintiff, Thompson Products, Inc.
- 2. I certify that I am a member in good standing of the Bar in every jurisdiction in which I have been admitted to practice, including the Bar of the Commonwealth of Virginia.
- 3. I certify that there are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
- 4. I further certify that I am familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court.



Sworn under the pains and penalties of perjury, this 12th day of January, 2006.

Sandy T. Tucker

WILLIAMS MULLEN

A Professional Corporation 1021 East Cary Street (23219)

Post Office Box 1320

Richmond, VA 23218-1320

Tel: 804.783.6418 Fax: 804.783.6507

COMMONWEALTH OF VIRGINIA

) to-wit:

CITY OF RICHMOND

The foregoing instrument was sworn to before me this 12th day of January, 2006, by

Sandy T. Tucker, Esquire.

Notary Public

My commission expires: $\sqrt{30/2007}$

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

THOMPSON PRODUCTS, INC.,)	
Plaintiff,)	
v.	j (C.A. No. 05-11810-RGS
GLENN THOMPSON, et al.,)	
Defendants.)	
)	

AFFIDAVIT OF MONICA McCARROLL IN SUPPORT OF ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE

- I, Monica McCarroll, on oath, hereby state as follows:
- 1. I am an attorney practicing in the Commonwealth of Virginia. I make this affidavit of my own personal knowledge in support of a motion that my colleague, Sandy T. Tucker, and I be permitted to appear before this Court *pro hac vice* as co-counsel for the plaintiff, Thompson Products, Inc.
- 2. I certify that I am a member in good standing of the Bar in every jurisdiction in which I have been admitted to practice, including the Bar of the Commonwealth of Virginia.
- 3. I certify that there are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
- 4. I further certify that I am familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court.

EXHIBIT

B

Sworn under the pains and penalties of perjury, this 12th day of January, 2006.

Monica McCarroll
WILLIAMS MULLEN

A Professional Corporation 1021 East Cary Street (23219)

Post Office Box 1320

Richmond, VA 23218-1320

Tel: 804.783.6418 Fax: 804.783.6507

COMMONWEALTH OF VIRGINIA

) to-wit:

CITY OF RICHMOND

The foregoing instrument was sworn to before me this 12th day of January, 2006, by

Monica McCarroll, Esquire.

Notary Public

My commission expires: ___

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